

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NEIL SURESH CHANDRAN,

Defendant.

4:22CR3077

**UNOPPOSED MOTION TO DIRECT
THE SALINE COUNTY JAIL TO
PERMIT DEFENDANT ACCESS TO A
LAPTOP COMPUTER FOR THE
LIMITED PURPOSES OF
DISCOVERY REVIEW AND
TRIAL PREPARATION**

The Defendant, Neil Suresh Chandran, by and through counsel, moves this court for an order pursuant to Federal Rule of Criminal Procedure 16(d)(1) directing the Saline County Jail to permit the Defendant access to a laptop computer for the limited purpose of discovery review and trial preparation. In support of this motion, the Defendant states as follows:

1. This case has been designated complex and extended due to the technical and voluminous nature of the material facts.
2. As of this point, over two terabytes of discovery have been produced by the government.
3. The government has produced discovery in forms which can only be accessed effectively through a computer and computer aided search tools.
4. The Defendant needs to review the discovery to aid and assist in his own defense.

5. The Saline County Jail is a three- hour round trip drive from counsel's office. Counsel also has a full caseload of other matters before the court. Requiring the presence of counsel would make it impossible to have the discovery reviewed in an effective and timely manner.

6. To facilitate discovery review, the Federal Public Defender's office has prepared a computer and external hard drive for the Defendant to use in absence of counsel. All hardware necessary for internet connection has been disabled and the computers settings and programming are password protected. The only use for the computer would be to review discovery, and assist in his defense.

7. Currently, the staff at Saline County Jail will not permit inmates access to a computer without counsel present. Staff at the Saline County Jail represented to counsel that they can accommodate granting an inmate use of a computer for discovery review in the absence of counsel, but they will not do so without a court order.

8. The bulk of the materials for review are the Defendant's own records and related to conversations and exchanges attributed, in part, to the Defendant. The parties agree that the materials will not be disseminated to third parties and that the prior protective order be amended to accommodate this order.

9. The Defendant, through counsel, has discussed this matter with Trial Attorney Tian Huang who does not object to the Defendant's request.

WHEREFORE, the Defendant respectfully requests this Court issue an order directing the Saline County Jail to permit Neil Suresh Chandran access to a laptop

computer and external hard drive of data for the limited purpose of discovery review and trial preparation.

Respectfully submitted,

NEIL SURESH CHANDRAN, Defendant,

By: s/ David R. Stickman

DAVID R. STICKMAN

Federal Public Defender

222 South 15th Street, Suite 300N

Omaha, NE 68102

(402) 221-7896

fax: (402) 221-7884

e-mail: david_stickman@fd.org